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Attorneys for Plaintiff and Counter-defendant Calista Enterprises Ltd.

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON – PORTLAND DIVISION

**CALISTA ENTERPRISES LTD.,**  
a Republic of Seychelles company,

Plaintiff,

- v. -

**TENZA TRADING LTD.,**  
a Cyprus company,

Defendant.

Case No. 3:13-cv-01045-SI

**DECLARATION OF MATTHEW  
SHAYEFAR IN SUPPORT OF CALISTA  
ENTERPRISES LTD.'S MOTION FOR  
LEAVE TO AMEND COMPLAINT TO  
CORRECT CITATION IN HEADING**

**TENZA TRADING LTD.,**  
a Cyprus company,

Counterclaim Plaintiff,

- v. -

**CALISTA ENTERPRISES LTD.,**  
a Republic of Seychelles company, and  
**ALEXANDER ZHUKOV,**  
a Czechoslovakian citizen,

Counterclaim Defendants.

I, Matthew Shayefar, declare as follows:

1. I am an attorney licensed to practice in the Commonwealth of Massachusetts and the State of California and I am admitted to practice *pro hac vice* before this Court. I am an attorney at Boston Law Group, PC, counsel of record for Plaintiff and Counter-defendant Calista Enterprises Ltd. (“Calista”) in this action against Defendant and Counterclaimant Tenza Trading Ltd. (“Tenza”). I have personal knowledge of the facts stated herein. If called upon to do so, I could and would testify to the truth thereof.

2. While drafting the Complaint in the above captioned action, I committed a scrivener’s error in the heading for Count I. I unintentionally cited “§ 15 U.S.C. § 1125(2)(D)(5)” for the claim under the Anticybersquatting Consumer Protection Act. However, the section number for the Anticybersquatting Consumer Protection Act (and Count I) should have read “§ 1114(2)(D)(v).”

3. The scrivener’s error was clearly unintentional because “§ 15 U.S.C. § 1125(2)(D)(5)” does not actually exist.

I swear under the penalty of perjury pursuant to the laws of the United States that the foregoing is true and correct.

Dated: July 2, 2014

/s/ Matthew Shayefar  
Matthew Shayefar